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8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 HEATHER HILLBOM, individually and on  
behalf of all others similarly situated,

12 Plaintiff,

13 vs.  
14

15 R1 RCM INC.; and DIGNITY HEALTH d/b/a  
DIGNITY HEALTH - ST. ROSE DOMINICAN  
16 HOSPITAL, ROSE DE LIMA CAMPUS,

17 Defendants.  
18

Case No.: 2:24-cv-00664-JAD-EJY

**STIPULATION AND ORDER TO STAY  
PROCEEDINGS**

**(SECOND REQUEST)**

ECF Nos. 18, 32



1 Plaintiff Heather Hillbom (“Plaintiff”), by and through her undersigned counsel, and  
2 Defendants R1 RCM Inc. (“R1”) and Dignity Health d/b/a St. Rose Dominican Hospital (“Dignity  
3 Health” and, together with R1, “Defendants”), by and through their undersigned counsel, hereby  
4 stipulate and request that the Court further stay proceedings in the above-captioned action. In  
5 support of this stipulation, the parties state as follows:

6 On April 5, 2024, Plaintiff filed a Class Action Complaint advancing claims arising from an  
7 alleged data security incident affecting Defendants. *See* ECF No. 1. Defendants filed a Joint  
8 Motion to Dismiss Plaintiff’s Class Action Complaint (“Motion”) on August 27, 2024, and the  
9 parties completed briefing on October 31, 2024. ECF Nos. 18, 22, 24.

10 Amid briefing on Defendants’ Motion, the parties scheduled an in-person mediation with  
11 Bruce A. Friedman (JAMS), an experienced mediator in lawsuits involving alleged data security  
12 incidents, for January 29, 2025 in an effort to resolve the case. The parties accordingly requested  
13 that the Court temporarily stay proceedings pending the outcome of the mediation. ECF No. 25.  
14 On November 6, 2024, the Court granted the parties’ stipulation, which provided for a stay of all  
15 litigation deadlines, including the Court’s hearing of Defendants’ Motion and disposition thereof.  
16 ECF No. 26. Pursuant to the stipulation, the Court ordered the parties to file a joint status report by  
17 February 12, 2025, advising the Court on whether the mediation was successful and proposing next  
18 steps. *Id.*

19 As provided in the joint status report filed concurrently herewith, the parties participated in a  
20 full-day mediation on January 29, 2025 and were ultimately able to reach an agreement in principle  
21 to resolve this matter on a class-wide basis. The parties are in the process of drafting a written  
22 settlement agreement, and Plaintiff intends to file a motion for preliminary approval with the Court  
23 once the settlement agreement is finalized and executed. The parties anticipate that this process will  
24 take ninety (90) days.

25 To conserve the resources of this Court and the parties, the parties request that this case, and  
26 all litigation deadlines, be temporarily stayed for an additional ninety (90) days. This request to  
27 stay proceedings is made in good faith to allow the parties to focus their attention and resources on  
28 the execution of a written settlement agreement, and on Plaintiff’s motion for preliminary approval,

with the aim of resolving this case. This is the parties' second stipulation to stay proceedings, and it is not made for any improper purpose or other reason of delay.

IT IS THEREFORE STIPULATED, and the parties respectfully request, that the Court temporarily stay all proceedings and deadlines in this case, including the hearing on and disposition of Defendants' Motion, for an additional ninety (90) days pending the parties' execution of a class-wide settlement agreement and the filing of Plaintiff's motion for preliminary approval thereof. In the event a settlement agreement has not yet been executed, or if Plaintiff's motion for preliminary approval is otherwise not able to be filed within ninety (90) days, the parties will alternatively file a joint status report providing an update to the Court no later than May 13, 2025.

DATED this 12th day of February, 2025.

By: /s/ Mona Amini

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By: /s/ Philip R. Erwin

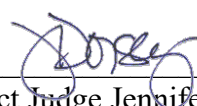
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### ORDER

Based on the parties' stipulation [ECF No. 32] and good cause appearing, IT IS ORDERED that **THIS CASE IS STAYED through May 13, 2025**. The parties must file motions regarding settlement or a status report by May 13, 2025. In light of the impending settlement, IT IS FURTHER ORDERED that **the Defendants' Joint Motion to Dismiss Plaintiff's Class Action Complaint [ECF No. 18] is DENIED** as moot and without prejudice to its prompt refiling should the settlement not be completed.

  
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U.S. District Judge Jennifer A. Dorsey  
Dated: February 13, 2025